



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 22, 2015

Eric D. Smith  
Federal Registration Manager  
PBI/Gordon Corporation  
P.O. Box 014090  
Kansas City, Missouri 64101-0090

Subject: Label Amendment – Addition of ants, marketing claims, and modification of mixing directions and rates, within approved use rates  
Product Name: Sagacity 20SG  
EPA Registration Number: 2217-935  
Application Date: March 13, 2015  
Decision Number: 503301

Dear Mr. Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2  
EPA Reg. No. 2217-935  
Decision No. 503301

with FIFRA section 6. If you have any questions, please contact Rita Kumar by phone at (703) 308-8291, or via email at [kumar.rita@epa.gov](mailto:kumar.rita@epa.gov).

Sincerely,

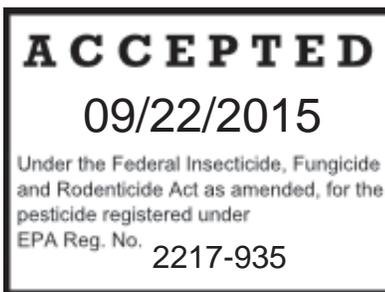
A handwritten signature in black ink, appearing to read 'MS', with a long horizontal stroke extending to the right.

Mark Suarez  
Product Manager 07  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# SAGACITY(TM) 20 SG

## EPA Reg. No. 2217-935



Alternate Brand Name: Zylam 20SG Systemic Turf Insecticide  
EPA Est. No. \_\_\_\_

Group 4A Insecticide

For foliar and systemic insect control in turfgrass. For Outdoor Landscape Use Only

**ACTIVE INGREDIENT:**

Dinotefuran, [N-methyl-N'-nitro-N''-((tetrahydro-3-furanyl)methyl)guanidine] ..... 20%

**OTHER INGREDIENTS:** ..... 80%

**TOTAL** ..... 100%

### KEEP OUT OF REACH OF CHILDREN

## CAUTION

**STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

Use in accordance with applicable state and federal regulations.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Do not allow contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

### User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**User Safety Recommendations**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

<b>First Aid</b>	
<b>If on skin or on clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call poison control center or doctor for further treatment advice.</li> </ul>
<p><b>HOT LINE NUMBER:</b> Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency information on (product, use, etc.), call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.</p>	

## Environmental Hazards

This pesticide is toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in water adjacent to treated areas. Do not dispose equipment washwaters or rinsate into a natural drain or water body.

This product is toxic to honey bees. The persistence of residues and potential residual toxicity of Dinotefuran in nectar and pollen suggests the possibility of chronic toxic risk to honey bee larvae and the eventual instability of the hive.

- This product is toxic to bees exposed to residue for more than 38 hours following treatment.
- Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

Dinotefuran and its degradate, MNG have the properties and characteristics associated with chemicals detected in groundwater. The high water solubility of dinotefuran, and its degradate, MNG, coupled with its very high mobility, and resistance to biodegradation indicates that this compound has a strong potential to leach to the subsurface under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Periodic monitoring of shallow groundwater in the use area is recommended.

## Spray Drift Advisory

Do not apply under conditions involving possible drift to food, forage or other plantings that might be damaged or the crop thereof rendered for sale, use or consumption.

## Physical or Chemical Hazards

Do not use, pour, spill, or store near heat or open flame.

## PROTECTION OF POLLINATORS



**APPLICATION RESTRICTIONS** EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

### **This product can kill bees and other insect pollinators.**

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at:

<http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: [www.aapco.org/officials.html](http://www.aapco.org/officials.html). Pesticide incidents should also be reported to the National Pesticide Information Center at: [www.npic.orst.edu](http://www.npic.orst.edu) or directly to EPA at: [beekill@epa.gov](mailto:beekill@epa.gov)

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### **FOR COMMERCIALY GROWN ORNAMENTALS NOT UNDER CONTRACT FOR POLLINATION SERVICES BUT ARE ATTRACTIVE TO POLLINATORS:**



- Do not apply this product while bees are foraging
- This product is toxic to bees exposed to treatment for more than 38 hours following treatment.
- Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

## NON-AGRICULTURAL USES:



Do not apply [SAGACITY(TM) 10 SL] while bees are foraging. Do not apply [SAGACITY(TM) 10 SL] to plants that are flowering. Only apply after all flower petals have fallen off.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### **Agricultural Use Requirements**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, greenhouses and handlers of agricultural insecticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

EXCEPTION: If product is drenched or soil-injected, workers may enter the area at any time if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is:

- Coveralls
- Shoes plus socks
- Chemical resistant gloves (made of any waterproof material)

### **Non-Agricultural Use Requirements**

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not allow others to enter treated areas until sprays have dried.

## **1. Product Information**

Applications of Sagacity 20 SG in residential areas may be made by commercially licensed applicators.

### **Application to Turfgrass:**

Use Sagacity 20 SG for the control of soil inhabiting pests of turfgrass such as Masked Chafers, European Chafer, Green June Beetle, May or June Beetle, Japanese Beetle, Oriental Beetle, Billbugs, Annual Bluegrass Weevil, Black Turfgrass Ataenius, Ants (excluding fire, pharaoh, harvester, Argentine, or carpenter ants), and Mole Crickets. Sagacity 20 SG is also suitable for surface feeding insects such as: armyworms, of cutworms and chinchbugs in turfgrass areas.

Apply Sagacity 20 SG as directed on outdoor residential, recreational and commercial turfgrass in sites such as home lawns, commercial lawns, multi-family residential and apartment complexes, grounds or lawns around business and office complexes, shopping centers, airports, military and other institutions, cemeteries, golf courses, playgrounds, parks, athletic fields and sod farms.

Target timing of Sagacity 20 SG applications at or just prior to or during egg laying of the target pests. The need for an application can be based on historical and/or physical monitoring of the site, current season adult trapping, previous experience or other methods. Optimum control will be achieved when applications are made at first appearance or just prior to or at egg hatch of the target pests followed by sufficient irrigation or rainfall to move the active ingredient through the turf thatch layer. Consult your State Extension Service for information regarding specific application timing.

Do not apply when the target site is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist.

## **2. Resistance Management**

Sagacity 20 SG contains a Group 4A insecticide. Insect biotypes with acquired resistance to Group 4A may eventually dominate the insect population if Group 4A insecticides are used repeatedly in the same crop or in successive years as the primary method of control for a targeted species. This may result in partial or total loss of control of those species by Sagacity 20 SG or other Group 4A insecticides.

To delay the development of insecticide resistance in greenhouse, nursery and interiorscape use sites, strongly consider the following guidelines:

- Do not apply Sagacity 20 SG or other Group 4A insecticides to consecutive generations of the same insect pest species.
- Do not drench soil media with Sagacity 20 SG or other Group 4A insecticides more than one time per crop cycle or three months, whichever is shorter.
- Do not make more than two foliar or broadcast sprays of Sagacity 20 SG or other Group 4A insecticides to a single crop during a two-month period.
- Do not make more than one soil drench and one foliar or broadcast spray with Sagacity 20 SG or other Group 4A insecticides during a two-month period.
- Base insecticide use on a comprehensive IPM program.
- Monitor treated insect populations for loss of field efficacy.
- Contact your local extension specialist, certified crop advisors, and/or manufacturers for insecticide resistance management and/or IPM guidelines for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact PBI/Gordon Corporation [1-877-800-5556 or [www.company.com](http://www.company.com)]

## **3. Mixing Instructions**

**Sagacity 20 SG Alone:** Add half of the required amount of water to the mix tank. With the agitator running, add the desired amount of Sagacity 20 SG to the tank. Continue agitation while adding the remainder of the water. Begin application of the solution after Sagacity 20 SG has completely dispersed into the mix water. Maintain agitation until all of the mixture has been applied.

**Sagacity 20 SG + Tank Mixtures:** Add half of the required amount of water to the mix tank. Start the agitator running before adding any tank mix partners. In general, add tank mix partners in this order: products packaged in water soluble packaging, wettable powders, wettable granules (dry flowables), liquid flowables, liquids, emulsifiable concentrates, and surfactants/adjuvants. Always allow each tank mix partner to become fully dispersed before adding the next product. Provide sufficient agitation while adding the remainder of the water. Maintain agitation until all the mixture has been applied.

**NOTE:** When using Sagacity 20 SG in tank mixtures, add all products in water soluble packaging to the tank before any other tank mix partner, including Sagacity 20 SG. Allow the water soluble packaging to completely dissolve and the product(s) to completely disperse before adding any other tank mix partner to the tank.

If using Sagacity 20 SG in a tank mixture, observe all directions for use, crop/sites, use rates, dilution ratios, precautions, and limitations which appear on the tank mix product label. Do not exceed label dosage rate, and follow the most restrictive label precautions and limitations. Do not mix this product with any product that prohibits such mixing. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are labeled.

#### **Volumes, weights, and conversions:**

Use the following equivalent, unpacked volumetric weights.

1 tablespoon = 0.22 oz = approximately 1/4 oz;  
2.5 tablespoons = 0.55 oz = approximately 1/2 oz;  
3.5 tablespoons = 0.77 oz = approximately 3/4 oz;  
4.5 tablespoons = 0.99 oz = approximately 1 oz;  
28 grams = 1.0 oz  
2.7 lb = 43.2 oz

#### **Compatibility:**

**IMPORTANT** The safety of all potential tank mixes has not been tested on all crops. Before applying any tank mixture not specifically listed on this label, confirm the safety to the target crop.

Sagacity 20 SG is compatible with most commonly used pesticides, crop oils, adjuvants, and nutritional sprays. However, since it is not possible to test all possible mixtures, pre-test to assure the physical compatibility and lack of phytotoxic effect of any proposed mixtures with Sagacity 20 SG. To determine the physical compatibility of Sagacity 20 SG with other products, use a jar test, as described below:

Using a quart jar, add the proportionate amounts of the products to 1 quart of water. Add wettable powders and water dispersible granular products first, then liquid flowables, and emulsifiable concentrates last. After thoroughly mixing, let stand for at least 5 minutes. If the combination remains mixed or can be remixed readily, it is physically compatible. Once compatibility has been proven, use the same procedure for additional required ingredients to the spray tank.

## **4. Application Procedures and Spray Equipment**

**Ground Application:** Select spray nozzles that will provide accurate and uniform spray deposition. Use spray nozzles that provide medium-sized droplets and reduce drift. To help insure accuracy, calibrate sprayer before each use. For information on spray equipment and calibration, consult nozzle manufacturers and/or State Extension Service specialists.

Apply Sagacity 20 SG using sufficient water volume to provide thorough and uniform coverage. In situations where a dense canopy exists and/or pest pressure is high, use greater water volumes. The use of a spray adjuvant may improve spray coverage. Do not apply under conditions where uniform coverage cannot be obtained or where excessive spray drift may occur.

**Applications to turfgrass:** Apply Sagacity 20 SG through conventional spray equipment in a minimum of 1 gallon of finished spray per 1000 sq.ft. Ensure adequate distribution in the treated area using accurately calibrated equipment normally used for application of turfgrass insecticides. Use equipment that will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly. Prevent skips by using marker dyes or foam aids.

#### **Restrictions**

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Prevent runoff or puddling of irrigation water following application.
- Keep children and pets off treated areas until spray has dried.

- Do not apply to areas that are water logged or saturated, or frozen, which will not allow penetration into the root zone of the plant.

**Minimizing Spray Drift**

As with all crop protection products, it is important to minimize off-target movement. Do not allow spray to drift onto adjacent land, crops, or aquatic areas. To minimize spray drift:

1. Make applications when wind velocity favors on-target product deposition (approximately 3 to 10 mph). Do not apply when wind velocity exceeds 10 mph. Do not apply when wind gusts approach 10 mph.
2. Risk of exposure to sensitive aquatic areas can be reduced by not applying when wind direction is toward the aquatic area.
3. Do not cultivate or plant crops within 25 feet of the aquatic area as to allow growth of a vegetative filter strip.
4. Do not make applications during temperature inversions. Inversions are characterized by stable air and increasing temperatures with increased height above the ground. Mist or fog may indicate the presence of an inversion in humid areas. The applicator may detect the presence of an inversion by producing smoke and observing a smoke layer near the ground surface.
5. Use the largest droplet size consistent with good pest control. Small droplets are more prone to spray drift and can be minimized by appropriate nozzle selection, by orienting nozzles away from the air stream as much as possible, and by not using excessive spray boom pressure.
6. Apply as close to target plants as practical to obtain a good spray pattern for adequate coverage. Do not apply more than 10 ft above the crop canopy.
7. For aerial applications, mount spray boom on the aircraft so as to minimize drift caused by wing tip vortices. Use minimum practical boom length and do not use boom that exceeds 75% of wing span or rotor diameter.

**5. Turfgrass**

<b>Application Rate</b>	<b>Restriction</b>	<b>Pest</b>	<b>Remarks</b>
2.7 lb per acre 1 oz per 1000 sq.ft. [0.54 lb a.i. per acre]	Do not apply more than a total of 2.7 lb per acre (1.0 oz per 1000 sq.ft.) [0.54 lb a.i. per acre] of Sagacity 20 SG per acre of turf per year	Annual bluegrass weevil Billbug	For optimum control of annual bluegrass weevil and billbugs, make application prior to or during egg hatch of the target pest or apply at first appearance of young larvae.
		Ants (excluding fire, pharaoh, harvester, Argentine, or carpenter ants)	Apply at first appearance of ants that are actively foraging.
		Chinch bug	For control of chinch bugs, make application prior to hatching of the first sign of instar nymphs or when turf damage first appears.
		Crane fly, European	Apply in the spring, when larvae are mature but prior to pupation or in the fall prior to egg hatch.
		Mole cricket Southern mole cricket Tawny mole cricket	Make application prior to or during the peak egg hatch period. When adults or large nymphs are present and actively tunneling, tank mix with a curative insecticide

**Table 1. Application rates for residential, recreational, and commercial turfgrass**

Application Rate	Restriction	Pest	Remarks
		White grub larvae [suppression] such as: Asiatic garden beetle Black Turfgrass ataeenius European chafer Green June beetle Japanese beetle May/June beetle Northern masked chafer Oriental beetle Southern masked chafer	For optimum control of grubs, make application prior to or during egg hatch of the target pest.
		Armyworm Cutworms Sod webworm	Apply at first appearance while pests are small.

**Important Notes:**

- Apply in sufficient water to ensure thorough coverage of target area. Use a minimum of 50 gallons finished spray per acre.
- Consult your local State Extension Service or State Extension Turfgrass Specialists for more specific information on timing of insecticide applications.
- For optimal absorption, translaminar movement, and control, avoid applications immediately before rainfall or irrigation. For best results, do not irrigate or water for 24 hours after application. If rainfall does not occur in 48 hours after application, irrigate with sufficient water to ensure movement of the active ingredient through the thatch and into the root zone.

**Restrictions:**

- Make only one application per year.

## **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Keep pesticide in original container. Store in a cool dry place.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available or dispose of in a sanitary landfill, or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

## **LIMITED WARRANTY AND DISCLAIMER**

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY

DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

## **APPENDIX**

### **1. Statements which may appear on different label components depending on packaging configuration.**

- See next panel for additional Precautionary Statements and First Aid
- Net Weight: \_\_\_\_\_
- EPA Est. No. \_\_\_\_\_

### **2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:**

- GROUP -- 4A -- INSECTICIDE
- Zylam(TM) is a trademark of PBI/Gordon Corporation.
- Volumetric Mixing Chart

<b>Volumes, weights, and conversions</b>	
1 tablespoon (unpacked)	0.22 oz (approximately 1/4 oz)
2.5 tablespoons (unpacked)	0.55 oz (approximately 1/2 oz)
3.5 tablespoons (unpacked)	0.77 oz (approximately 3/4 oz)
4.5 tablespoons (unpacked)	0.99 oz (approximately 1 oz)
28 grams	1.0 oz
2.7 lb	43.2 oz

- Controls surface and sub-surface turfgrass insect pests
- Labeled for all turfgrass areas
- Controls [listed] tough turfgrass insects [as listed]
- Systemic activity
- Translocation [through the xylem]
- Translocated within the vascular tissue [xylem]
- Translaminar and allows it to be sprayed on the upper surface of turfgrass blade and moving to the underside.
- Convenient 1 acre packaging
- Dust-free extruded granules
- Low-odor
- Rapid control of [tough] turfgrass insects [including [list of labeled insects]]
- Acts by contact and ingestion [resulting in termination of feeding] Insect death occurs after [ingestion].
- Works systemically with knockdown activity
- Residual control

## **DOCUMENT CONTROL INFORMATION**

**1. Unique Label Identifier:** 002217-00935.20150824.amend-proposed-clean

**2. Reason for Issue:** EPA Comments #2